EX PARTE OR LATE FILED

Bell Atlantic

Bell Atlantic Network Services, Inc.
1133 20th Street, N.W.
Suite 810
Washington, DC 20036
202 392-1189
FAX 202 392-1369

Maureen Keenan
Director - FCC Relations

DOCKET FILE COPY ORIGINAL

December 30, 1993

EX PARTE

Mr. William F. Caton
Acting Secretary
Federal Communications Commission
1919 M Street, N.W., Room 222
Washington, D.C. 20554

Re: CC Docket 93-162

Dear Mr. Caton,

The attached material is being submitted today to G. Vogt, A. Glatter, C. Frentrup, and C. Canteen of the Tariff Division in conjunction with the above referenced proceeding. Please enter the material into the record as appropriate.

Please contact me if there are any questions regarding this material.

Sincerely,

Maureen Keenan (g.p.n)

Attachment

cc: C. Canteen
C. Frentrup
A. Glatter
G. Vogt

Bell Atlantic's Standard Design For Collocation Circuits

- Created to ensure quality service to Bell Atlantic's customers, including collocators.

- Designed to prevent collocator circuit anomalies from affecting customers' services at any distance while meeting transmission interconnect requirements identified in Bellcore's 1984 practice entitled **New Inter-DSX Tie Lines** (Bellcore Recommendation Letter IL-84/09-23).

- Facilitates trouble isolation and prompt service restoration.

- Helps to reduce provisioning intervals.

- Represents the most economical design to meet the attached **service-quality-based key criteria.**

The Bell Atlantic Collocation Design

Service-Quality-Based Key Criteria

Bell Atlantic has established the following **key criteria** to meet the standards associated with customer requirements for DS1 and DS3 services under collocation arrangements:

1) **Complete Equalization Capability**

Equalization provided by the Bell Atlantic repeatered tie pair design is a benefit to not only Bell Atlantic but also to the collocator. Each party is provided a signal which has been built out to an engineered circuit standard and terminated on its respective DSX jacks or interface point ("equal level point"). This is important in order to ensure that every signal reaching the equal level point is of the same level and of the same quality. This also ensures that cross-connects made on Bell Atlantic's side or possible restoral patches made on the collocator's side of the tie pair can be made from every piece of equipment to every other piece of equipment with minimal chance of signal induction (cross-talk/noise) or any other problem caused by mismatch of signals.

2) **Ensured Quality Circuit**

The maintenance features provided by repeatered tie pairs benefit not only the collocator but also end users. Repeaters facilitate prompt trouble isolation through features such as loop back testing; eliminating the need for time-consuming and costly joint testing and enabling circuit restoral in up to fifty percent less time. This is particularly important in out-of hour situations, especially when the office is not manned. Further, repeaters ensure signal compatibility between collocators' equipment and the equipment used by Bell Atlantic to serve other customers, and thereby help to minimize the chance that crosstalk/noise will affect other customers' services provided through Bell Atlantic's shared network. Repeaters also preclude over-voltages, as addressed below, from interrupting service provided to other customers through the shared network.

3) **Isolated Customer Circuits**

Repeatered tie pairs offer both Bell Atlantic and a collocator protection from over-voltages. These over-voltages could cause major interruptions to any end users' services, not just those served by collocators, as well as costly facility damage. As Bell Atlantic stated in its Reply to Comments on Bell Atlantic's Direct Case (C.C. Docket No. 93-162), page A-6, CAPS themselves require customers to purchase repeaters or other equipment for purposes of network protection.

4) **Minimal Cost Up Front and Ongoing**

While repeatered tie pairs are not the only design that will provide the above features; they are the most economical and, therefore, the first choice of Bell Atlantic. Repeaters provide a design option that is easiest to install and is easy to maintain. Their use in collocation arrangements is expected to inhibit the rise in maintenance costs and will facilitate service restoral, thereby reducing circuit down time from the beginning.

These criteria can be met by using a repeater 100% of the time. While unique CO conditions, such as riser congestion, may lead to different designs involving more expensive terminating equipment, the use of a repeater presents the lowest-cost option for meeting these criteria where such conditions do not exist. Failure to meet these criteria <u>will</u> affect not only the collocating customers but also end user customers being served by Bell Atlantic and collocators through collocation arrangements.

Bell Atlantic's Standard Design For Collocation Circuits

- Bell Atlantic remains committed to provide the highest level of quality possible to its customers. Because Shared Network Arrangements (SNA) are available through Bell Atlantic's special access collocation tariff, Bell Atlantic's customers can be collocators, end users that connect to collocators, or end users not connected to collocators. (SNA makes the end user Bell Atlantic's customer of record for the local channel connecting to the collocator's cross-connect.)

- Bell Atlantic is sensitive to the need for prompt and efficient service restoration and, in the case of collocation, the increased need for multiple providers to identify and remedy problems as a team. Bell Atlantic's design facilitates its ability to quickly isolate a circuit trouble or verify and report to the collocator that there is none on the Bell Atlantic portion of the circuit, thereby enabling the collocator to further evaluate its portion of the circuit and re-establish service to the end user customer.

- A CAP's own local personnel recognized the benefits of using repeaters for collocation circuits when they indicated that they want repeaters to be used for those circuits but that they just do not want to pay for them.